



State of Utah

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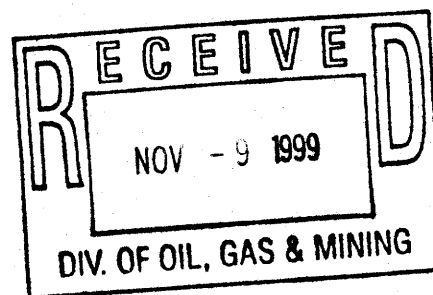
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Don A. Ostler, P.E.
Executive Secretary

November 4, 1999

Paula H. Doughty, Manager
Environmental Compliance
Kennecott Utah Copper Corporation
8315 West 3595 South
P.O. Box 6001
Magna, Utah 84044-6001



Dear Ms. Doughty:

Subject: Request to Stockpile Class B Biosolids for Land Reclamation

The purpose of this letter is to clarify the requirements contained in our earlier letter to Kennecott dated August 3, 1999, regarding the management and stockpiling of biosolids.

During the July 28, 1999 meeting we discussed the concern about the potential impact to ground water from long term stockpiling of biosolids. We all agreed that the desired BMP was to minimize the duration of stockpiling. Therefore, we included in management practices listed in our letter to Kennecott dated August 3, 1999, the requirement that the biosolids be incorporated into the soil and seeded every ninety days. We believed this was consistent with Kennecott's ongoing remediation efforts, but have now been informed that this is not the case. Apparently applying the biosolids during the dryer summer months is not conducive to these revegetative efforts. Since the main risk to ground water is from the generation of leachate which should be minimal during the dryer months we acknowledge that the ninety day requirement listed as Number three in the above referenced letter is not essential and no longer required as a BMP provided the other conditions are followed.

We understand that primarily due to economic considerations Kennecott has temporarily suspended or curtailed its use of biosolids. If we can be of assistance as you reassess the use of biosolids for future remediation efforts, please let us know.

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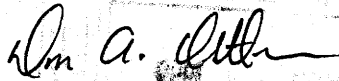
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We trust this clarifies our position on this matter and is consistent with our desire to promote the beneficial use of biosolids while ensuring protection of our ground water resources. If you or anyone else have any questions please contact me at 538-6081 or Mark Schmitz at 538-6097.

Sincerely,

Utah Water Quality Board



Don A. Ostler, P.E.

Executive Secretary

DAO:MS:cc

cc: Bob Brobst, EPA Region VIII
Lynn Kunzler, DOGM
Reed Fisher, P.E., Central Valley WRF
Rex Ausburn, P.E., Snyderville Basin SID
John Hays, South Valley WRF
John Adams, Salt Lake City, WRF
Dan Stewart, Magna WRF
Royal Delegee, Salt Lake City/County Health Dept.

MSCHMITZWPA DOUGHTY.LTR